REMARKS

Reconsideration of the pending application is respectfully requested on the basis of the following particulars:

Claim Rejections under 35 U.S.C. §103(a)

Claims 1-4 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Abbondanzio et al. (U.S. Patent No. 6,968,414 – hereinafter Abbondanzio). Applicant respectfully traverses this rejection at least for the reason that Abbondanzio fails to teach, disclose, or suggest each and every limitation recited in the rejected claims.

Abbondanzio generally describes a system for monitoring the insertion and removal of server blades in a data processing system. According to col. 5, lines 35-63 and Fig. 3 of Abbondanzio, each of server blades 100 includes a tamper latch 135. Tamper latch 135 includes mechanisms that indicate whether a corresponding device or apparatus has been altered. In an embodiment of Abbondanzio, tamper latch 135 utilizes an impedance element that is electrically altered when a server blade 100 is inserted or removed from its slot. A local service processor 116 of each server blade reads its corresponding tamper latch to determine if the blade has been removed since the last power up event. If the tamper latch is broken (i.e., the impedance of the tamper latch is altered), the local service processor 116 sends an insertion notification to management module 120 and resets tamper latch 135.

Applicant respectfully asserts that tamper latch 135 of Abbondanzio is a passive device and is located at a back end of server blade 100 where physical identification (PID) connectors 130 are also located. Hence, the tamper latch 135 of Abbondanzio does not appear to be observable by a human being when the server blade is in its slot in a cabinet. Further, the passive tamper latch 135 of Abbondanzio is not for fastening a blade server to its cabinet, and the tamper latch 135 does not appear to be capable of being activated to producing a tripping action.

In contrast with Abbondanzio, Applicant's claimed invention is directed to a method of remotely tripping a blade server in a rack. Applicant's method according to claim 1 includes reading an input instruction of tripping a latch used to fasten each of the blade

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servers to the rack from an employee, sending the input instruction to the blade server via a network switch, and causing the blade server to trip the latch from the rack according to the input instruction.

According to the claimed invention, when a server blade is tripped, the tripped blade server is easily observable by an employee who has a duty to find that particular blade server of interest among a plurality of blade servers. That is, when the latch used to fasten each blade server to its rack is tripped remotely by the employee, a visual indication is provided to the employee to facilitate the visual recognition of the blade of interest among many other blade servers in a rack or plurality of racks. This visual indication provided by a tripped latch advantageously reduces the time and effort for the employee to find the server blade of interest. Applicant respectfully asserts that tamper latch 135 of Abbondanzio is structurally and functionally different from Applicant's latch used to fasten each blade server to its rack, as recited in claim 1.

As mentioned above, tamper latch 135 of Abbondanzio is merely a passive impedance device located at an unobservable back end of blade server 100 when the blade server is situated in its slot. That is, the tamper latch of Abbondanzio is not used for fastening the blade server to its cabinet. Further, there is no means for an employee to send a signal to tamper latch 135 of Abbondanzio. As noted above, the local service processor 116 monitors the tamper latch and resets the tamper latch without human intervention as described in Abbondanzio.

The requirements for establishing a *prima facie* case of obviousness, as detailed in MPEP § 2143 - 2143.03 (pages 2100-122 - 2100-136), are: first, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference to combine the teachings; second, there must be a reasonable expectation of success; and, finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. As Abbondanzio only describes a tamper latch and its function as a tamper detection mechanism but not a latch for fastening a blade server to its rack, the examiner's contention that Abbondanzio describes Applicant's claimed steps of reading an input instruction of tripping a latch used to fasten each of the blade servers to the rack from an employee, sending the input instruction to the blade server via a network switch, and causing the blade server to trip the latch from the rack according to the input instruction is insupportable.

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With regard to the examiner contention that it would have been obvious to one skilled in the art at the time the invention was made to realize that ejecting mechanism of an object or turning on a LED indication can be implemented to quickly identify abnormal condition of a particular blade among a cluster of blade servers in a rack, Applicant respectfully asserts that, given the tamper latch 135 of Abbondanzio is a passive impedance device locating at a back end of a blade server, there appears to be no possible modification to turn tamper latch 135 of Abbondanzio into a latch for fastening a blade server or a modified fastening latch capable of being tripped in an ejected position. Further, "to quickly identify abnormal condition of a particular blade among a cluster of blade" as contended by the examiner as the motivation for modifying Abbondanzio is neither disclosed nor suggested by the use of tamper latch 135.

In view of the arguments set forth above, Applicant respectfully requests reconsideration and withdrawal of the §103(a) rejection of claim 1. For the same reasons, the rejections of claims 2-4, which depend from claim 1, are respectfully requested to be reconsidered and withdrawn.

Conclusion

In view of the foregoing remarks, it is respectfully submitted that the application is in condition for allowance. Accordingly, it is requested that claims 1-4 be allowed and the application be passed to issue.

If any issues remain that may be resolved by a telephone or facsimile communication with the Applicant's attorney, the Examiner is invited to contact the undersigned at the numbers shown.

Respectfully submitted,

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